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Of Attorneys for Debtor-in-Possession.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re: Case No. 18-34244-pcm11

CHRISTIAN S. RADABAUGH, SR.,

Debtor.

SECOND MOTION TO EXTEND TIME TO FILE AMENDED SCHEDULES

Christian S. Radabaugh, Sr., (the "Debtor"), as debtor-in-possession, hereby moves this Court for the entry of an order extending the deadline by which the Amended Schedules (the "Schedules") must be filed from January 25, 2019 to January 28, 2019 at noon. In support of the motion, Debtor asserts the following:

- 1. On January 11, 2019, the Court entered a Scheduling Order [EFC No. 83] requiring the Debtor to file amended schedules on or before January 23, 2019.
- 2. On January 24, 2019, the Court entered an Order [EFC No. 92] extending the time for the Debtor to file amended schedules to on or before January 25, 2019.
- 3. Debtor and Counsel have been diligently working on preparing amended schedules as ordered, however, Debtor needs additional time to review the amended schedules

Page 1 – MOTION TO EXTEND TIME {00239583:1}

Motschenbacher & Blattner, LLP 117 SW Taylor St., Suite 300 Portland, OR 97204 Phone: (503) 417-0500 Fax: (503) 417-0501 drafted by Counsel. Debtor continues to be unable to review the schedules because he has been

unexpectedly out of town more than anticipated due to his business of hauling cattle for other

ranchers. Debtor has assured his Counsel that he will be able to devote the necessary time to

appropriately review and sign his amended schedules by noon on January 28, 2019.

4. The requested extension is minimal, and thus should not prejudice any parties in

interest. The Debtor asserts that this request is not made for purposes of delay.

WHEREFORE, the Debtor prays for the Court to enter an order in the form attached

hereto as **Exhibit 1**, extending the deadline set forth in the Court's prior Scheduling Order,

requiring the Debtor to file his amended schedules on or before January 28, 2019 at noon.

DATED January 25, 2019

MOTSCHENBACHER & BLATTNER LLP

By:/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB #074027

Of Attorneys for Debtor-in-Possession

Page 2 – MOTION TO EXTEND TIME {00239583:1}

EXHIBIT 1

PROPOSED ORDER

{00239583:1}

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

CHRISTIAN S. RADABAUGH, SR.,

Debtor-in-Possession,

Case No. 18-34244-pcm11

ORDER GRANTING SECOND MOTION TO EXTEND TIME TO FILE AMENDED SCHEDULES

THIS MATTER having come before the Court on the Second Motion to Extend Time to file Debtor's Amended Schedules filed by Christian S. Radabaugh, Sr. ("Debtor"). The Court having reviewed the motion, and being otherwise duly advised; now, therefore,

IT IS HEREBY ORDERED as follows:

- 1) Debtor's Motion to Extend Time is GRANTED.
- 2) The Debtor shall file his Amended Schedules by January 28, 2019 at noon.

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Order Presented By:
MOTSCHENBACHER & BLATTNER LLP
By:/s/ Nicholas J. Henderson
Nicholas J. Henderson, OSB #074027
Of Attorneys for Debtor-in-Possession

PAGE 1 - ORDER GRANTING MOTION TO EXTEND TIME {00239583:1}

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2019, a full and true copy of the foregoing SECOND MOTION TO EXTEND TIME TO FILE AMENDED SCHEDULES was serviced on all ECF participants via the Court's CM/ECF processes:

Dated: January 25, 2019 /s/ Troy G. Sexton

Troy G. Sexton

Of Attorneys for Debtor-in-Possession

CERTIFICATE OF SERVICE {00239583:1}

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